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**MEMO ENDORSED**

March 30, 2023

**Sent Via ECF**

Hon. Valerie E. Caproni  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Wang et al v. JFD Sushi Restaurant Inc et al  
Case No. 22-cv-04401-VEC

**REQUEST FOR AN EXTENSION OF TIME TO AMEND COMPLAINT**

Dear Judge Caproni:

This office represents Plaintiffs Chunming Wang, Xian Qing Ye, Ruiyan Liu, and Shou Le Chen (“Plaintiffs”) in the above referenced matter. Plaintiff writes to the Court to request an extension of the current deadline to move to file an amended complaint that adequately alleges standing as to Plaintiff’s recoding keeping claims. Plaintiff requests that the current time to do so, which is March 31, 2023, be extended by 1 week to April 7, 2023.

Plaintiffs make this request as Plaintiff’s counsel needs additional time to consult with all four Plaintiffs as to the basis for each of their standing in these claims and to gather supporting exhibits and/or declarations. As of the writing of this letter, counsel have only been able to confer with some of the Plaintiffs regarding this issue and need the additional time to confer with the remaining Plaintiffs so as to properly represent their interests.

This is Plaintiffs’ first request for the extension. We have consulted with Defendants’ counsel and they consent to this request. There would be no prejudice to any party by granting this request.

We thank Your Honor for your time and consideration in this matter.

Respectfully submitted,

LAW OFFICES OF VINCENT S. WONG

/s/ Michael Brand  
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Application GRANTED.

SO ORDERED.



03/30/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE